

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re: Bair Hugger Forced Air Warming MDL No. 15-2666 (JNE/DTS)
Devices Products Liability Litigation

This Document Relates to:
ALL ACTIONS

**DEFENDANTS' MOTION FOR CONTEMPT ORDER AND SANCTIONS
FOR VIOLATIONS OF COURT ORDERS REGARDING
SEALING AND CONFIDENTIALITY**

Pursuant to Federal Rule of Civil Procedure 16, Defendants 3M Company and Arizant Healthcare Inc. (together, "Defendants") move this court for an order (i) holding Plaintiffs' MDL Counsel Genevieve Zimmerman, Gabriel Assaad, and Kyle Farrar in contempt, and (ii) imposing sanctions for repeated violations of this Court's orders regarding sealing and confidentiality. This motion is based upon the accompanying Memorandum in support of the Motion, the Declaration of Benjamin W. Hulse, as well as all the files, records, and proceedings herein.

Dated: June 6, 2019

Respectfully submitted,

s/Benjamin W. Hulse

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